

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

# **EXHIBIT I**

Docket No. FBT-CV-18-6076475-S	:	JUDICIAL DISTRICT
:		
ERICA LAFFERTY, et al.	:	OF FAIRFIELD
:		
v.	:	AT BRIDGEPORT
:		
ALEX JONES, et al.	:	JANUARY 24, 2019

**RESPONSES TO PLAINTIFFS' FIRST SET OF SPECIAL INTERROGATORIES TO  
ALEX JONES**

**1. Identify:**

- a. All business organizations and/or other entities in which you have ownership and/or control**
- b. The officers or members of all organizations and/or entities responsive to part (a)**
- c. The shareholders or other owners of all organizations and/or entities responsive to part (a)**
- d. The employees of all organizations and/or entities responsive to part (a)**

**ANSWER:**

- a.** I, Alex Jones, have ownership and/or control of the following business organizations and/or other entities: Free Speech Systems LLC, InfoWars LLC, InfoWars Health LLC, and PrisonPlanet TV LLC
- b.** I am the sole officer and member of all the organizations and/or entities responsive to part (a).
- c.** I am the sole shareholder and owner of all organizations and/or entities responsive to part (a).
- d.** The employees of all organizations and/or entities responsive to part (a) are attached hereto as Exhibit 1. Free Speech Systems has the employees listed in Exhibit 1, and the Department heads/managers are as follows: Rob Dew, Manager of Media/Video Production; Paul Joseph Watson, Editor/Manager of Writers; Tim Fruge, Director of Business Operations.

**concerning that subject matter. Identify the owner of such domain names or URLs.**

**ANSWER:**

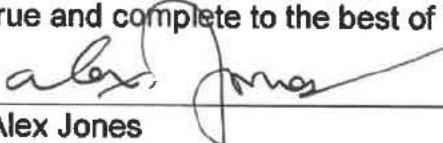
Infowars.com, PrisonPlanet.com, prisonplanet.tv

**5. Identify any witnesses you may call at a hearing on a special motion to dismiss.**

**ANSWER:**

Alex Jones and the Plaintiffs

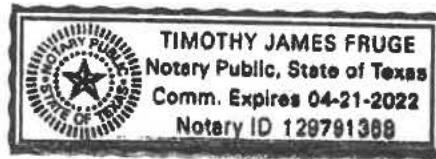
Under the penalty of perjury, I certify the above answers to these interrogatories are true and complete to the best of my knowledge.

 Dated: 3-29-19  
Alex Jones

Subscribed and Sworn before me:

 Dated: 3-29-19  
Timothy Fruge

My Commission Expires:



Docket No. FBT-CV-18-6076475-S	:	JUDICIAL DISTRICT
;		
ERICA LAFFERTY, et al.	:	OF FAIRFIELD
;		
v.	:	AT BRIDGEPORT
;		
ALEX JONES, et al.	:	JANUARY 24, 2019

**RESPONSES TO PLAINTIFFS' FIRST SET OF SPECIAL INTERROGATORIES TO  
FREE SPEECH SYSTEMS LLC, INFOWARS, LLC, PRISON PLANET TV LLC and  
INFOWARS HEALTH, LLC**

**1. Identify:**

- a. Your officers**
- b. Your members**
- c. Your shareholders or other owners**
- d. Your employees**
- e. All business organizations and/or other entities in which you have ownership and/or control**

**ANSWER:**

a. b. & c. I, Alex Jones, am the sole owner, officer and member of each of the above named LLCs.

d. Only Free Speech Systems LLC has employees those employees are attached hereto as Exhibit 1. The Department heads/managers of Free Speech Systems LLC are as follows: Rob Dew, Manager of Media/Video Production; Paul Joseph Watson, Editor/Manager of Writers; Tim Fruge, Director of Business Operations.

**2. Identify employees responsible for marketing data, research, and/or analytics concerning Infowars, Infowars.com, The Alex Jones Radio Show, and Alex Jones. If such responsibilities were outsourced or contracted out, identify the individual and/or entities to whom they were contracted.**

**Shooting, Sandy Hook Investigation, Non-Governmental Investigation, Sandy Hook Families, or Sandy Hook Hoax Theory, or otherwise contain content concerning that subject matter. Identify the owner of such domain names or URLs.**

ANSWER:

As to Free Speech Systems LLC only: Infowars.com, PrisonPlanet.com, prisonplanet.tv. There are dozens of other URLs, but those are either not active or are set up to act as pointer (redirect) site to the main Info Wars website. A list can be assembled, there are no such URLs referencing Sandy Hook or mass shootings.

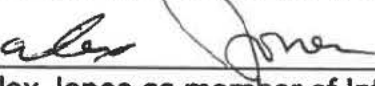
The other entities have no URLs.

**5. Identify any witnesses you may call at a hearing on a special motion to dismiss.**

ANSWER:

Alex Jones and the Plaintiffs

Under the penalty of perjury, I certify the above answers to these interrogatories are true and complete to the best of my knowledge.

 Dated: 3-29-19  
Alex Jones as member of Infowars LLC, Free Speech Systems LLC, Infowars Health LLC, Prison Planet TV LLC

Subscribed and Sworn before me:

 Dated: 3-29-19  
Timothy Fruge

My Commission Expires:

